

JS 44 (Rev. 06/17)

The JS 44 civil cover sheet and the information provided herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Jane Doe

(b) County of Residence of First Listed Plaintiff Montgomery County, Pennsylvania
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Andres Jalon, Esquire, Derek Smith Law Group,
1845 Walnut Street, Suite 1601, Philadelphia, Pennsylvania 19103

DEFENDANTS

Homesite Remodeling, Inc., Mill McKenzie (individually), Jim Brown (individually)

County of Residence of First Listed Defendant Bucks County, Pennsylvania
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) Arthur T. Healey Esquire, 1406 Heritage Village, Southbury, CT 06488

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	1	1	Incorporated or Principal Place of Business In This State	4	4
Citizen of Another State	2	2	Incorporated and Principal Place of Business In Another State	5	5
Citizen or Subject of a Foreign Country	3	3	Foreign Nation	6	6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

VI. CAUSE OF ACTION

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND'S

CHECK YES only if demanded in complaint:

JURY DEMAND: ' Yes ' No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

JAN 22 2018

DATE 1/22/18 SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

JHS
 IN THE UNITED STATES DISTRICT COURT
 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CASE MANAGEMENT TRACK DESIGNATION FORM

JANE DOE

CIVIL ACTION

v.

 HOMESITE REMODELING, INC., MIKE
 McKenzie (Individually), Jim Brown (individually):

 NO. **18 266**

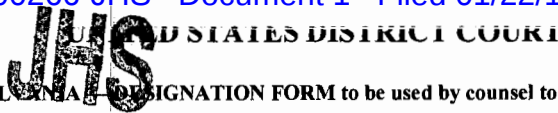
In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff social security benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

1/22/18**Date**Andres Jaion, Esquire**Attorney-at-law**Plaintiff, Jane Doe**Attorney for**215-391-4790**Telephone**215-893-5288**FAX Number**andres@dereksmithlaw.com**E-Mail Address**

JAN 22 2018



FOR THE EASTERN DISTRICT OF PENNSYLVANIA DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

18 266

Address of Plaintiff: Andres Jalon, Esquire, Derek Smith Law 1845 Walnut Street, Suite 1601, Philadelphia, Pennsylvania 19103

Address of Defendant: Homesite Remodeling, Inc. 312 North Wales Road, North Wales, Pennsylvania 19454

Place of Accident, Incident or Transaction: North Wales, Pennsylvania (Bucks County)

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes

No **X**

Does this case involve multidistrict litigation possibilities?

Yes

No **X**

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes No **X**
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes No **X**
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes No **X**
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
Yes No **X**

CIVIL: (Place **U** in ONE CATEGORY ONLY)

A Federal Question Cases:

1. **9** Indemnity Contract, Marine Contract, and All Other Contracts
2. **9** FELA
3. **9** Jones Act-Personal Injury
4. **9** Antitrust
5. **9** Patent
6. **9** Labor-Management Relations
7. **U** Civil Rights
8. **9** Habeas Corpus
9. **9** Securities Act(s) Cases
10. **9** Social Security Review Cases
11. **9** All other Federal Question Cases
(Please specify) _____

B Diversity Jurisdiction Cases:

1. **9** Insurance Contract and Other Contracts
2. **9** Airplane Personal Injury
3. **9** Assault, Defamation
4. **9** Marine Personal Injury
5. **9** Motor Vehicle Personal Injury
6. **9** Other Personal Injury (Please specify) _____
7. **9** Products Liability
8. **9** Products Liability — Asbestos
9. **9** All other Diversity Cases
(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Andres Jalon, Esquire, counsel of record do hereby certify:

- 9** Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- 9** Relief other than monetary damages is sought.

DATE: 01/22/18

Andres Jalon, Esquire
Attorney-at-Law

83685

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE 01/22/18

Andres Jalon, Esquire
Attorney-at-Law

83685

Attorney I.D.#

JAN 22 2018

JHS
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

-----X
JANE DOE,
Plaintiff,

Civil Action No.:

18 266

-against-

COMPLAINT

HOMESITE REMODELING, INC., MIKE Mc KENZIE
(individually), JIM BROWN (individually)

Plaintiff Demands
Trial by Jury

Defendant.
-----X

Plaintiff, JANE DOE, as and for her Complaint against the above Defendants respectfully alleges upon information and belief as follows:

NATURE OF THE CASE

1. Plaintiff complains pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000e et seq., ("Title VII"). Plaintiff also complains pursuant to the Pennsylvania Human Relations Act, 43 P.S. Section 951 et seq., ("PHRA") and seeks damages to redress the injuries Plaintiff suffered as a result of gender discrimination, pregnancy discrimination, sexual discrimination, unlawful termination and retaliation by Defendants, as set forth in this complaint.

JURISDICTION AND VENUE

2. Jurisdiction of this action is conferred upon the court as this action involves a Federal Question under the Civil Rights Act of 1964. The Court also has supplemental jurisdiction over the State Causes of Action.

3. Venue is conferred upon this district court since both Plaintiff and Defendant are residents of the Commonwealth of Pennsylvania and the controversy occurred within the Eastern District of Pennsylvania.
4. This controversy exceeds \$150,000.00, excluding interest, attorney's fees and damages.
3. On or around March 18, 2016, Plaintiff dual-filed charges with the EEOC and PHRC against Defendants as set forth herein.
4. On or around October 24, 2017, the EEOC issued Plaintiff a Right to Sue.
5. This action is being commenced within 90 days of receipt of the EEOC Right to Sue Letter.

PARTIES

6. Plaintiff, Jane Doe, is a female individual (hereinafter, referred to as Plaintiff or "DOE"), residing in the Commonwealth of Pennsylvania.
7. At all times material, Defendant is Homesite Remodeling, Inc. (hereinafter referred to as Defendant or "HOMESITE") is a domestic corporation, duly registered in the Commonwealth of Pennsylvania.
8. At all times material, Defendant Mike McKenzie (hereinafter referred to as Defendant or "MCKENZIE"), was employed by Defendant HOMESITE in a supervisory capacity.
9. At all times material, Defendant Jim Brown (hereinafter referred to as Defendant or "BROWN"), was and remains the owner of HOMESITE.

MATERIAL FACTS

10. In or around the end of December 2015, Plaintiff became aware that she was approximately twelve weeks pregnant.

11. In or around January 2016, Plaintiff began working for HOMESITE as a
“Telemarketer.”
12. In or around the middle of January 2016, Plaintiff notified several of HOMESITE’s
employees that she was pregnant, including her supervisor MCKENZIE.
13. Throughout Plaintiff’s employment with Defendants’, after she reported that she was
pregnant, Plaintiff was subjected to numerous acts of sexual harassment, gender
discrimination, retaliation and hostile work environment.
14. In or around February 2016, MCKENZIE began to treat Plaintiff differently.
MCKENZIE began regularly talking to Plaintiff in an offensive, unwelcome, and
sexually obscene manner. Plaintiff didn’t know what to do, but she was certain that if
she didn’t “play along” she would be terminated by MCKENZIE.
15. At all times material, MCKENZIE would lurk and linger near Plaintiff while she was
working. MCKENZIE would make sexually explicit comments about Plaintiff’s appearance
stating that she was “sexy” and “made him hot.” Plaintiff found MCKENZIE’s actions
bothersome and it made her very anxious. Plaintiff needed to stay employed so she engaged
MCKENZIE behavior hoping that at some point, even if that came after the delivery of her
child, MCKENZIE would leave her alone.
16. MCKENZIE became overbearing, demanded that Plaintiff tell him when she
scheduled all of her obstetrician/gynecologist appointments. Plaintiff found these
questions alarming and became concerned with MCKENZIE’s escalating behavior.

17. On or around March 24, 2016, MCKENZIE told Plaintiff that “you’re pregnancy is so hot because that mean’s I cannot get you pregnant.”
18. That evening, following Plaintiff’s shift, MCKENZIE became more aggressive with Plaintiff. MCKENZIE began sending Plaintiff sexually explicit and offensive text messages.
19. By means of example only, MCKENZIE regularly asked, “When are you gonna text dirty to me?”
20. MCKENZIE would send Plaintiff’s messages such as “tell me what you like,” “my shits swelling,” “I gotta see those titties,” and sending picture messages of his penis.
21. At all times material, MCKENZIE knew his behavior was sexually offensive and not permitted, even sending Plaintiff a text message on one occasion, after asking for provocative pictures, “my gonna get fired, lol.”
22. On or around March 28, 2016, Plaintiff called out of work sick.
23. On or around March 29, 2016, MCKENZIE cornered Plaintiff upon her return to work demanding to know how she was feeling. Plaintiff was becoming intolerant of MCKENZIE’s intrusive behavior and feared that the stress from MCKENZIE’s behavior would affect her pregnancy.
24. Throughout the rest of the day, MCKENZIE proceeded to call Plaintiff “sexy” and “a freak.” Plaintiff was horrified and decided that she would not allow any further escalation of MCKENZIE’s lecherous behavior and inappropriate conduct.

25. On or around April 8, 2016, Plaintiff reported the ongoing sexual harassment by MCKENZIE to BROWN. In turn, BROWN questioned Plaintiff about the harassment, stating, "You do know these are very strong accusations?"
26. Plaintiff was honest with BROWN, stating that she had sent some provocative messages to MCKENZIE when he demanded them, explaining "I did what I had to do to keep my job and support my baby." Plaintiff stated that she felt uncomfortable working near MCKENZIE and that his behavior had escalated.
27. BROWN stated that he would look into the claims of sexual harassment and call Plaintiff the following week.
28. BROWN never properly investigated MCKENZIE's conduct and comments and never took appropriate corrective action. BROWN made no effort to contact or follow up with Plaintiff.
29. On or around April 15, 2016, one week after Plaintiff's report to BROWN, Defendants' constructively discharged Plaintiff.
30. Defendant's made conditions so unbearable for the Plaintiff that no woman in Plaintiff's shoes would have been expected to continue working under such conditions.
31. That as a result of Defendants' conduct and comments, Plaintiff was caused to sustain serious and permanent personal injuries, including permanent psychological injuries.
32. Plaintiff suffers from regular panic attacks and nightmares relating to Respondents' conduct.
33. As a result of Defendants' actions, Plaintiff felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed.

34. As a result of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer the loss of income, the loss of salary, bonuses, benefits and other compensation which such employment entails, and Plaintiff also suffered future pecuniary losses, emotional pain, humiliation, suffering, inconvenience, loss of enjoyment of life, and other non-pecuniary losses. Plaintiff has further experienced severe emotional and physical distress.
35. As Defendants' conduct has been malicious, willful, outrageous, and conducted with full knowledge of the law, Plaintiff demands Punitive Damages as against Defendants.
36. The above are just some examples of some of the discrimination to which Defendants subjected Plaintiff.
37. The Defendants have exhibited a pattern discrimination.

AS A FIRST CAUSE OF ACTION
FOR DISCRIMINATION UNDER TITLE VII
(Not Against Individual Defendants)

38. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.
39. Title VII states in relevant parts as follows: § 2000e-2. *[Section 703]*(a) Employer practices It shall be an unlawful employment practice for an employer – (1) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin."

40. Defendants engaged in unlawful employment practices prohibited by 42 U.S.C. § 2000e, *et seq.*, by discriminating against Plaintiff because of her sex, gender and pregnancy.

AS A SECOND CAUSE OF ACTION
FOR RETALIATION UNDER TITLE VII
(Not Against Individual Defendants)

41. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

42. Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e-3(a) provides that it shall be unlawful employment practice for an employer:

“(1) to ... discriminate against any of his employees ... because [s]he has opposed any practice made an unlawful employment practice by this subchapter, or because [s]he has made a charge, testified, assisted or participated in any manner in an investigation, proceeding, or hearing under this subchapter.”

43. Defendants engaged in unlawful employment practice prohibited by 42 U.S.C.

§2000e *et*

seq. by retaliating against Plaintiff with respect to the terms, conditions or privileges of employment because of her opposition to the unlawful employment practices of Defendants.

AS A THIRD CAUSE OF ACTION
FOR DISCRIMINATION UNDER STATE LAW

44. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

45. The PHRA § 955 provides that it shall be an unlawful discriminatory practice: "(a) For any employer because of the race, color, religious creed, ancestry, age, sex, national origin or non-job related handicap or disability or the use of a guide or support animal because of the blindness, deafness or physical handicap of any individual or independent contractor, to refuse to hire or employ or contract with, or to bar or to discharge from employment such individual or independent contractor, or to otherwise discriminate against such individual or independent contractor with respect to compensation, hire, tenure, terms, conditions or privileges of employment or contract, if the individual or independent contractor is the best able and most competent to perform the services required."
46. Defendants engaged in an unlawful discriminatory practice by discriminating against the Plaintiff because of her sex and gender.
47. Plaintiff hereby makes a claim against Defendants under all of the applicable paragraphs of the PHRA § 955.

AS A FOURTH CAUSE OF ACTION
FOR RETALIATION UNDER STATE LAW

48. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.
49. PHRA § 955(d) provides that it shall be an unlawful discriminatory practice: " For any person, employer, employment agency or labor organization to discriminate in any manner against any individual because such individual has opposed any practice forbidden by this act, or because such individual has made a charge, testified or assisted, in any manner, in any investigation, proceeding or hearing under this act."

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, in an amount to be determined at the time of trial plus interest, including but not limited to all emotional distress and back pay and front pay, punitive damages, liquidated damages, statutory damages, attorneys' fees, costs, and disbursements of action; and for such other relief as the Court deems just and proper.

Dated: Philadelphia, Pennsylvania
January 22, 2018

DEREK SMITH LAW GROUP, PLLC
Attorneys for Plaintiff

By: 

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